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SPECTRUM LABORATORIES, LLC

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

AIM HIGH INVESTMENT GROUP, LLC,

Plaintiff/Counter-Defendant,

Vs.

SPECTRUM LABORATORIES, LLC,

Defendant/Counter-Claimant.

Case No. 8:22-mc-00011-DOC-ADS

Assigned to Judge David O. Carter
and Magistrate Judge Autumn D.
Spaeth

**UNOPPOSED MOTION FOR
LEAVE TO ATTEND AUGUST
17, 2022 HEARING REMOTELY**

Hearing Date: August 17, 2022
Time: 10:00 AM
Courtroom: 6B, 6th Floor Ronald
Reagan Federal Building

Unopposed Motion for Leave to Attend August 17, 2022 Hearing Remotely

In accordance with the Court's Standing Orders, Respondent Spectrum Laboratories, LLC moves unopposed to convert the August 17, 2022 Hearing to a remote hearing or, alternatively, to grant leave to allow Spectrum's Ohio-based attorney to attend remotely per the Court's procedures. The good cause for this request is as follows.

1. On July 20, 2022, petitioner Aim High Investment Group, LLC filed this miscellaneous action and moved to compel non-parties Element Santa Fe Springs ("Element") and S&N Labs ("S&N") to comply with document subpoenas issued to them by Aim High.

2. The subpoenas issued from a patent infringement case between Aim High and Spectrum Laboratories, LLC, which is pending in the United States District Court for the District of Nevada, Case No. 2:22-cv-00158-GMN-DJA.

3. Aim High filed here because the subpoenas required compliance in this District because S&N and Element both reside here.

4. This Court set a hearing on Aim High's motion for August 17, 2022 at 10:00 a.m. (PT).

4. Spectrum is an Ohio-based company, and its lead attorneys in this action and the Nevada Action are from the McDonald Hopkins LLC law firm in Cleveland, Ohio.

5. Matthew J. Cavanagh is the Spectrum attorney most familiar with the issues relevant to Aim High's motion, he researched the opposition to the motion, he is the attorney that engaged in the pre-suit settlement discussions with Aim High's counsel at issue, and he has applied to appear in this action pro hac vice.

6. Mr. Cavanagh, however, lives and works in Cleveland, Ohio, which is over 2,000 miles from this Courthouse. Thus, requiring Mr. Cavanagh to appear in-person would require significant air travel, which would result in (a) him losing up to two days

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1 with travel; (b) facing the expenses, burdens, and difficulties associated with such
 2 travel; and (c) Spectrum incurring extra legal fees that could be avoided if such travel
 3 was not required.

4 7. Spectrum respectfully submits that Mr. Cavanagh would be able to
 5 participate meaningfully and productively in the hearing if it were held by Zoom or
 6 teleconference.

7 8. Furthermore, because the motion is unopposed by Aim High, no party
 8 would be prejudiced by the granting of this motion.

9 For these reasons, Spectrum respectfully asks that the Court convert the August
 10 17, 2022 Hearing to a remote hearing or, alternatively, to allow Mr. Cavanagh to appear
 11 by remote means.

12
 13
 14 Dated: August 5, 2022

THE MALONEY FIRM, APC

/S/ CARL I. S. MUELLER

By: _____

CARL I.S. MUELLER
 PATRICK M. MALONEY

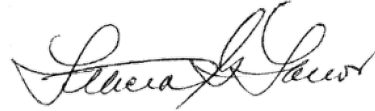
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 MATTHEW J. CAVANAGH, ESQ.
(pro hac vice application pending)

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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2022, I electronically filed the **UNOPPOSED MOTION FOR LEAVE TO ATTEND AUGUST 17, 2022 HEARING REMOTELY** with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF to all participants in the case who are registered CM/ECF users.



/s/ Leticia G. Larios

Leticia G. Larios, Employee At
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